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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND AD HOC COMMITTEE OF SENIOR
UNSECURED NOTEHOLDERS
EXTENDING TIME TO RESPOND TO
QUANTA ASSUMPTION MOTION**
Re: Dkt. No. 1218

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Ad Hoc Committee
4 of Senior Unsecured Noteholders (the “**Noteholders Committee**”), on the other. The Debtors
5 and the Noteholders Committee are referred to in this Stipulation and Agreement for Order
6 collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as
7 follows:

8 **RECITALS**

9 A. On April 3, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*
10 *§ 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 Approving the Utility’s Assumption of*
11 *Certain Agreements with Quanta Energy Services, LLC* [Dkt. No. 1218] (the “**Quanta**
12 **Assumption Motion**”), which is set for a hearing before the Court at 9:30 a.m. on April 24,
13 2019. Any response or opposition to the Quanta Assumption Motion is due by 4:00 p.m. (Pacific
14 Time) on April 17, 2019.

15 B. Counsel for the Noteholders Committee has requested, and counsel for the
16 Debtors has agreed, that the time for the Noteholders Committee to respond to the Quanta
17 Assumption Motion be extended.

18 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
19 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
20 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
21 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
22 **THAT:**

23 1. The time for the Noteholders Committee to file and serve any response or
24 opposition to the Quanta Assumption Motion is extended through 4:00 p.m. (Pacific Time) on
25 April 19, 2019.

26 *[Signatures on next page]*
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Dated: April 17, 2019

KELLER & BENVENUTTI LLP

/s/ Jane Kim
Jane Kim

*Attorneys for Debtors
and Debtors in Possession*

Dated: April 17, 2019

AKIN GUMP STRAUSS HAUER &
FELD LLP

/s/ Ashley Vinson Crawford
Ashley Vinson Crawford

*Attorneys for Ad Hoc Committee of Senior
Unsecured Noteholders*